

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

COMMON CAUSE RHODE ISLAND, LEAGUE OF WOMEN VOTERS OF RHODE ISLAND, MIRANDA OAKLEY, BARBARA MONAHAN, and MARY BAKER,

Plaintiffs,

- against -

NELLIE M. GORBEA, in her official capacity as Secretary of State of Rhode Island; DIANE C. MEDEROS, LOUIS A. DESIMONE JR., JENNIFER L. JOHNSON, RICHARD H. PIERCE, ISADORE S. RAMOS, DAVID H. SHOLES, and WILLIAM E. WEST, in their official capacity as members of the Rhode Island Board of Elections,

Defendants.

Case No. 1:20-cv-00318-MSM-LDA

**PLAINTIFFS' STATUS REPORT**

On August 3, 2021, the Court directed Plaintiffs in the above-captioned matter to “file a status report by September 3, 2021 advising the court of the current status of the above-referenced case.” Doc. 40. Plaintiffs hereby report that this matter has concluded. On August 13, 2020, the United States Supreme Court issued an Order in Pending Case in which it denied the application for stay submitted by the Republican National Committee and Republican Party of Rhode Island. *See Ex. A (Order in Pending Case); see also Republican Nat'l Comm. v. Common Cause R.I.*, 141 S. Ct. 206 (2020). The parties accordingly moved in the First Circuit Court of Appeals for a Joint Motion for Voluntary Dismissal of Appeal. *See Ex. B (Joint Motion for Dismissal)*. The First Circuit granted the parties’ Motion on August 17, 2020. *See Ex. C (Judgment)*. As Plaintiffs’ requested relief in this matter relates only to the primary and general

elections in the state of Rhode Island held in the year 2020, there is no pending controversy for this Court to decide.

Dated: August 24, 2021

Respectfully submitted,

/s/ Lynette Labinger  
Lynette Labinger, Esq. (Bar No.1645)  
128 Dorrance St., Box 710  
Providence, RI 02903  
(401) 465-9565 (phone)  
[ll@labingerlaw.com](mailto:ll@labingerlaw.com)  
Cooperating counsel,  
**AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF RHODE ISLAND**

/s/ Julie A. Ebenstein  
Julie A. Ebenstein, Esq. (*pro hac vice*)  
Dale E. Ho, Esq. (*pro hac vice*)  
**AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION, INC.**  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004  
(212) 284-7332 (phone)  
[jebenstien@aclu.org](mailto:jebenstien@aclu.org)  
[dho@aclu.org](mailto:dho@aclu.org)

/s/ Danielle Lang  
Danielle Lang, Esq. (*pro hac vice*)  
Jonathan Diaz, Esq. (*pro hac vice*)  
**CAMPAIGN LEGAL CENTER**  
1101 14th St. NW, Suite 400  
Washington, DC 20005  
(202) 736-2200 (phone)  
[dlang@campaignlegal.org](mailto:dlang@campaignlegal.org)  
[jdiaz@campaignlegal.org](mailto:jdiaz@campaignlegal.org)

*/s/ Michael C. Keats*

Michael C. Keats, Esq. (*pro hac vice*)  
Christopher H. Bell, Esq. (*pro hac vice*)  
**FRIED, FRANK, HARRIS, SHRIVER  
& JACOBSON LLP**

One New York Plaza  
New York, NY 10004  
(212) 859-8914 (phone)  
(212) 859-4000 (fax)

[Michael.Keats@friedfrank.com](mailto:Michael.Keats@friedfrank.com)  
[Christopher.Bell@friedfrank.com](mailto:Christopher.Bell@friedfrank.com)

**CERTIFICATION**

I certify that on August 24, 2021, I served a copy of the within document via the Court's CMECF system, which sent copies of this document to Counsel of Record.

*/s/ Lynette Labinger*  
Lynette Labinger, Esq.